

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

SANDRA DUNN,

Plaintiff,

v.

PMAB, LLC,

Defendant.

Civil Action File No.: 3:18-3127-JFA

**NOTICE OF REMOVAL**

**TO THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH  
CAROLINA**

NOW COMES Defendant, PMAB, LLC., for the purpose of removing this action (the “Action”) from the Court of Common Pleas of Richland County, South Carolina to the United States District Court for the District of South Carolina, and pursuant to the provisions of 28 U.S.C. §§ 1441 and 1446, respectfully shows as follows:

1. Upon information and belief, Plaintiff filed the Action in the Court of Common Pleas of Richland County, South Carolina on October 16, 2018.

2. Defendant received a filed copy of the Action, along with a Summons, on October 18, 2018.

3. The Action purports to allege claims against Defendant under two (2) federal statutes, the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* (“TCPA”) and the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* (“FDCPA”).

4. The Action is removable to the United States District Court under 28 U.S.C. §§ 1331 and 1441 on the grounds of federal question jurisdiction, in that the Action purports to

allege causes of action under the laws of the United States over which the United States District Court has original jurisdiction.

5. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is filed within thirty (30) days after Defendant's receipt of the initial pleading in the Action setting forth the claim for relief upon which the Action is based.

6. Pursuant to 28 U.S.C. § 1446(a), attached hereto and incorporated herein as **Exhibit "A"** are copies of all process, pleadings, and orders received by Defendant in the Action.

7. Upon receipt of this Notice of Removal, no further action shall be taken in the Action by the Court of Common Pleas of Richland County, South Carolina.

8. By filing this Notice of Removal, the Defendant demonstrates its consent to the removal of the Action to this Court.

9. Nothing in this Notice of Removal should be deemed a waiver of any defenses relating to lack of personal jurisdiction or lack or sufficiency of service. The Defendant will file an answer or other responsive pleading within the time limits established by Federal Rule of Civil Procedure 81(c), unless such limits are otherwise extended by the Court.

Respectfully submitted this 19<sup>th</sup> day of November, 2018.

**SHUMAKER, LOOP & KENDRICK, LLP**

/s/ Christian H. Staples

Christian H. Staples  
South Carolina Bar No. 101470  
101 South Tryon Street, Suite 2200  
Charlotte, NC 28280  
Phone: (704) 375-0057  
Fax: (704) 332-1197  
Email: [cstaples@slk-law.com](mailto:cstaples@slk-law.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this date served a copy of Defendant's Notice of Removal by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to:

Syed Ali Saeed, Esq.  
Saeed & Little, LLP  
1433 N. Meridian Street, Suite 202  
Indianapolis, IN 46202

Dave Maxfield, Esq.  
David Maxfield, Attorney  
P.O. Box 11865  
Columbia, SC 29211

Respectfully submitted this 19<sup>th</sup> day of November, 2018.

**SHUMAKER, LOOP & KENDRICK, LLP**

/s/ Christian H. Staples

Christian H. Staples  
South Carolina Bar No. 101470  
101 South Tryon Street, Suite 2200  
Charlotte, NC 28280  
Phone: (704) 375-0057  
Fax: (704) 332-1197  
Email: [cstaples@slk-law.com](mailto:cstaples@slk-law.com)